

Cooper & Kirk

Lawyers

A Professional Limited Liability Company

Nicole J. Moss
nmoss@cooperkirk.com

1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036

(202) 220-9636
Fax (202) 220-9601

January 11, 2022

VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: ***Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP**

Dear Judge Preska:

I write on behalf of Plaintiff Virginia Giuffre. Pursuant to Rule 1.A of Your Honor's Individual Practices, Plaintiff respectfully requests leave to file under seal a response in opposition to Defendant's letter requesting leave to exceed ten depositions (Doc. 391) and supporting exhibit. In support of this request, Plaintiff states that the letter will discuss material subject to protective order in this action and *Giuffre v. Maxwell*, Case No. 15-cv-74:33-LAP, and two exhibits contain protected deposition testimony from the same. Plaintiff will file publicly redacted versions of the letter and exhibits, until such time as Your Honor rules on this request, after which Plaintiff will be prepared to file unredacted versions of letter and exhibits if directed by the Court.

Respectfully,

/s/ Nicole J. Moss
Nicole J. Moss

CC: Counsel of Record (via ECF)